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The Law Office Of

2016 MAY 18 AM 11:43 AM C. BONIN

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May 13, 2016

VIA ELECTRONIC AND FIRST-CLASS MAIL

Jeff S. Jordan (jjordan@fec.gov)
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: **MUR 7029**

Dear Mr. Jordan:

I am counsel to the Hon. Edward G. Rendell, former Governor of the Commonwealth of Pennsylvania, and am filing this response on his behalf. The complaint was a political stunt, and it lacks legal and factual merit. Accordingly, no action should be taken.

As a preliminary matter, the complaint fails as a matter of law. In order to constitute illegal coordination, there needs to be some expenditure which was in fact coordinated between the candidate side and the independent side. The Republican Party of Pennsylvania alleges no such coordinated expenditure; indeed, there were none.

The facts are as follows: on March 9, EMILY's List announced publicly its plans to spend at least \$1 million in support of Katie McGinty's U.S. Senate campaign through WOMEN VOTE!, its independent expenditure arm.¹ To the extent that Gov. Rendell suggested that any further sums would be spent, he was merely engaging in speculation and conjecture based on EMILY's List's frequent public statements that her election was a priority for the organization, which solely exists to elect pro-choice Democratic women like McGinty.

Moreover, Rendell's sole personal contact at EMILY's List has been its president, Stephanie Schriock, whom we understand has no role with the independent expenditure arm. While Gov. Rendell has separately assisted both EMILY's List and McGinty with fundraising

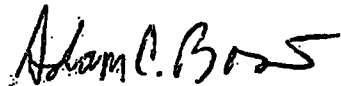
¹ See Laura Oisen, "EMILY's List to spend \$1 million on Katie McGinty," Allentown Morning Call (Mar. 9, 2016, 6:13 pm); available online at <http://www.mcall.com/news/nationworld/pennsylvania/capitol-ideas/mc-emily-s-list-to-spend-1-million-on-katie-mcginty-20160309-story.html>; EMILY's List/WOMEN VOTE! press release at <http://emilyslist.org/news/entry/women-vote-launches-1-million-program-in-pennsylvania>

efforts, at no point has he learned of private strategies or planning from either entity, and as such he could not and did not communicate any private information to the other. He had no material advance knowledge of, or involvement with their independent expenditure program. There simply were no impermissible communications with WOMEN VOTE!.

As for the League of Conservation Voters, that allegation as well is simply false; again, Rendell was speculating and predicting in his role as a longtime observer of and participant in Pennsylvania politics, not sharing private information. And, in this case, he was incorrect: so far as we know, the League of Conservation Voters did not contribute to any independent expenditure efforts in this race. Therefore, there was no League of Conservation Voters coordinated expenditure at all.

Gov. Rendell engaged in no improper coordination, and there was none. There is no reason to believe that he or any other party violated the Act, and the Commission should dismiss this matter.

Very truly yours,



ADAM C. BONIN

Enclosure

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FEDERAL ELECTION COMMISSION
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STATEMENT OF DESIGNATION OF COUNSEL

Provide one form for each Respondent/Witness

FAX 202-219-3923

MUR # 7029

Name of Counsel: Adam Bonin, Esq.

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The above-named individual and/or firm is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

5-13-16
Date

Edward G. Rendell

Signature (Respondent/Agent)

Title

RESPONDENT: Edward G. Rendell

(Committee Name/ Company Name/Individual Named in Notification Letter)

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This form relates to a Federal Election Commission matter that is subject to the confidentiality provisions of 52 U.S.C. § 30109(a)(12)(A). This section prohibits making public any notification or investigation conducted by the Federal Election Commission without the express written consent of the person under investigation.